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**VIA E-FILING**

Hon. Katharine H. Parker  
United States Magistrate Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: Daniel Kleeberg, et al. v. Lester Eber, et al.  
Case No. 1:16-cv-09517 (LAK/KHP)**

Dear Magistrate Judge Parker:

Please accept this joint motion letter regarding discovery deadlines. At our Scheduling Conference on May 30, 2018, it was all counsel's recollection that paper discovery would be set for an August 28, 2018 deadline prior to the September 5, 2018, with depositions to follow thereafter if no settlement is reached. Accordingly, subject to the Court's approval, all parties respectfully request that the current Scheduling Order setting August 28, 2018 as the deadline for all discovery be amended setting August 28, 2018 as the paper discovery deadline. Thank you for your consideration.

Respectfully,

s/Paul F. Keneally

Paul F. Keneally

PFK/gmc

cc.: Robert Calihan, Esq. (*via ECF and email*)  
Brian Brook, Esq. (*via ECF and email*)  
Daryoush Behbood, Esq. (*via email*)